

**RTPI**

mediation of space · making of place

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7 September 2009

EC Consultation on "A Sustainable Future for Transport"
Department for Transport
1/31 Great Minster House
76 Marsham Street
London SW1P 4DR

Email response sent to: EUFutureofTransport@dft.gsi.gov.uk

Dear Sir/Madam,

RESPONSE TO EC CONSULTATION: "A Sustainable Future for Transport"

Thank you for the opportunity to respond to the above. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public. The Transport Planning Society (TPS) has over 900 members and is dedicated to facilitating, developing and promoting knowledge, understanding and best practice in transport planning. The RTPI and the TPS work together through the joint Transport Planning Network.

This document responds to the EC Consultation: *"A Sustainable Future for Transport"*

The response has been formed drawing on the expertise of members including the RTPI/TPS Transport Planning Network.

If you require any further assistance, please contact Nicola Gough, Network Manager on 020 7929 9466 or email network.manager@rtpi.org.uk.

Yours sincerely

Rynd Smith
Director Policy and Partnerships

Enc.

CONSULTATION RESPONSE FORM

Commission Document 279/4- A Sustainable Future for Transport: Towards an integrated, technology-led and user friendly system

PART 1 - Information about you

Name	Nicola Gough
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Company Name or Organisation (if applicable)	Royal Town Planning Institute
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>The RTPI is a membership organisation representing over 22,000 spatial planners. The response has been formed drawing on the expertise of members including the RTPI/TPS Transport Planning Network.</p>	

If you would like your response or personal details to be treated **confidentially** please explain why:

N/a

PART 2 - Your Comments

General

1. What do you consider to be the most significant challenge facing transport policy over the next ten years?

The RTPI believes there are number of significant challenges facing transport policy over the next ten years, namely:

Challenge 1: Climate change and the significant contribution made to carbon emissions by transport emissions all suggest the need for significant changes in transport technologies and infrastructure to ensure that planning plays its key role in reducing climate change emissions.¹

Challenge 2: The increasing scarcity of fossil fuels, combined with the increasing need for the transport sector to mitigate its more broadly negative impact on the environment in terms of for example air quality, emissions, noise, etc all set against a background of an aging and growing population.

Challenge 3: The reallocation and redistribution of infrastructure, such as road space, to favour lower-impact modes of transport. Too often the existing lack of priority for lower-impact modes of transport over higher-impact modes gives rise to a situation where travellers are led to favour the mode which makes delay more acceptable (e.g. car for individual transport or goods vehicle for freight) because all modes are subject to a similar delay. Instead, infrastructure, such as road space, should be reallocated so that modes which offer greater efficiency, lower external costs and fewer adverse impacts are prioritised.

Challenge 4: As significant cuts in public expenditure will be required over this period, a key challenge will be the lack of finance needed to deliver investment in transport.

Challenge 5: Ensuring that, whatever the technological solutions to the fossil fuel / environmental issues of vehicles, there is sufficient access to quality affordable mobility for those for whom ownership or use of a private car is not an option; i.e. the implementation of "clean fuels" or other green technologies should not be taken as a signal to revert to the primacy of private cars over providing transport systems that meet all users needs.

2. What policy options do you believe that the Commission should consider in the development of the White Paper?

¹ The RTPI has recently launched '[Planning to Live with Climate Change](#)', supported by an action plan that will deliver practical outcomes, benefiting communities at the global and the local scale.

We believe that the Commission should consider the integration of aviation and high speed rail, and innovative options to enable more freight to travel on more sustainable options than by road. Technological solutions to i) reduce carbon emissions and ii) improve the attractiveness of non-personal motorized transport e.g. public transport interchange via integrated ticketing should also be considered.

3. What should the Commission's role be?

The RTPI believes that the overall role and objective of the Commission with regard to transport should be to support the move towards a low carbon transport system whilst continuing to support economic competitiveness.

In general terms, we believe the Commission should draw together best practice and disseminate this among member states, and support innovative 'pilot' projects to front-load technological advancement.

Section III- Trends and Challenges – page 6

4. Are the trends and challenges identified in this section the right ones?

Our members were broadly in support of the trends and challenges identified, and were particularly in agreement with the 'Environmental challenges' section. We believe this section recognises that the environmental threat from transport is real, significant and, most crucially, acts beyond any individual country's boundaries. However, we would suggest that this be stated explicitly.

We would like to raise the following points with regard to the following sections:

'Scarcity of fossil fuels': As the price of fossil fuels increases, more difficult-to-access fossil fuel deposits become economically viable to extract, raising cost and fuel supply, albeit at a cost that may be out of reach of many continuity and security issues. The RTPI in part believes that the challenge is to implement the "polluter pays" principle so that the user of the fossil fuels pays a cost which accurately reflects the full external costs they impose, bearing in mind where limited choice is available for vulnerable communities' exceptions are warranted. However, it will also be critically important for governments and public authorities to foster the innovation and economies of scale in production necessary to develop economically feasible modes of transport that do not rely on fossil fuels.

'Urbanisation': It could be argued that the outward movement of population into the countryside, where alternatives to motorised transport are less readily available, is a greater challenge than urbanisation. In particular, the paragraph on "Congestion" does not holistically address the issues: currently it both implies that congestion applies mainly to motorised modes and that congestion can be cured, ignoring the well-documented existence of induced traffic. This section should be revised to emphasise that the reallocation of infrastructure, and priority measures which favour certain modes over others, can ensure that lower-impact modes are less affected by congestion than higher-impact modes.

5. Are there any other trends and challenges that need to be included here and require European action?

As stated above, the RTPI is broadly in support of the trends and challenges identified. However, we would suggest that quality of life is an important challenge that has been omitted. Transport, by motorised modes in particular, has wide-ranging and well-documented effects on people who live, work, learn and play in its vicinity, for example community severance and lower social interaction in heavily trafficked streets. The document should recognise local-level impacts of transport, including those on non-users, which are distinct from both the private impacts on the transport user and the global-level environmental impacts.

We would also recommend that the document place greater emphasis on the role of Information technology. The ease of obtaining and sharing transport-related information is advancing rapidly, e.g. satellite navigation, electronic road tolling. The EU needs to ensure that development of technology proceeds at a similar pace for lower-impact modes of transport and to ensure compatibility and data-sharing protocols between the systems used by different transport operators, cities and member states.

The document may also benefit from a greater emphasis on increased personalisation within other modes of transport. Personalisation of cars has increased greatly in recent years with for example air conditioning, hands-free mobile phones and in-car music systems. It could be argued that the general lack of such personalisation on other modes of transport acts as a disincentive to modal shift. Conversely, other modes such as the train are already offering some alternative forms of personalisation such as wi-fi Internet access.

Section IV- Policy objectives- page 9-12

6. Do you believe that the Commission has identified the right policy objectives?

The RTPI is broadly in support of the policy objectives identified. Personal safety, security and comfort are important considerations, and ones which in recent years have been improving at a greater rate in private cars than in other modes of transport. Measures which improve security against intentional, e.g. terrorist, attack can in some cases be the same measures which improve perceptions of personal security, e.g. against low-level crime and anti-social behaviour.

However, a focus on road safety should emphasise that increased walking and cycling is desirable and the number of casualties should be measured relative to the overall distance travelled by these modes: measures which prevent or block people walking and cycling on the road network are not conducive to road safety as they encourage modal shift towards private car use and encourage complacency and excessive speed among motor vehicle drivers. Enforcement is a part of road safety and the necessary information-sharing should be facilitated so that traffic offences (including freight offences e.g. overloading, inadequate brakes etc.) committed outside the driver's home country are still routinely enforced.

There is, however, a major omission from the objectives, and that is the need to plan effectively *to reduce the need to travel*. Road safety, security, pollution and congestion could all be improved simply by there being less traffic. This has been a central tenet of planning policy in the UK since PPG13 in 1992, and needs to be carried forward at the heart of the current initiative.

7. Should the EU pay attention to other policy objectives? And if so which one(s)?

In terms of areas of high traffic volumes, the report focuses on the development of new infrastructure / improving current infrastructure as a way to reduce traffic rather than focusing on the potential that could be achieved by behavioural change and methods to actually take vehicles off of the roads.

The RTPI believes that greater focus should be placed on changing behaviour by encouraging smarter choices in transport selection. This could include ensuring that single occupancy car use is targeted as a major contributor to congestion and journey numbers. These measures would assist in reducing congestion on road networks and would be more cost-efficient than 'upgrading existing infrastructure', which the report identifies as 'in many cases the cheapest way to enhance the overall performance of the transport system'.

Specifically, we suggest that the section 'Behaviour: educate, inform and involve' needs to focus more on the key issues of behaviour in society. Although 'Consumer behaviour' is targeted as a main goal, we believe that the document would benefit from acknowledging that the way transport is used may be of equal importance as what transport is used. For example, single occupancy vehicles and empty car seats are a significant cause of inefficiency within the transport network and education and behaviour change should focus upon encouraging high vehicle occupancy.

Integration is a laudable objective and there should in particular be more integration of cycling with other modes, including bus and light rail services. However the document should emphasise more the need for integration of new technologies, e.g:

- I. Smartcard and mobile phone-based payment systems for public transport: such as those systems used in some European cities should be compatible
- II. Online mapping systems: these have developed rapidly to cater for car use, while for other modes of transport they have lagged behind. It is important that these mapping resources not only show public transport, cycling and walking routes, but can link to further information such as real-time running information and the option to buy a ticket online.

We would suggest that price signals are particularly effective for commercial users e.g. goods vehicles, company fleets, taxis. Emissions trading, or other instruments which put an accurate price on pollution, should be used at the European level to ensure that these users pay their full external costs. We consider it vitally important when considering the internalisation of all external costs in transport modes that existing taxes, both direct and indirect are considered and recognised.

8. Where specific operational goals have been identified in this section do you consider them to be deliverable?

We would suggest that very few real goals or targets have been identified, which could be considered a weakness of the communication document.

Section V- Policy instruments for sustainable transport- page 13-18

9. Where the Commission has identified specific policy instruments do you

believe that these are correct?

The RTPI suggests that the indicators on “traffic and congestion” need to consider how to accurately reflect impacts on different modes of transport. A certain degree of congestion is inevitable and can help to produce modal shift, as long as the more polluting modes are less able to avoid congestion. Typically the proposed indicators focus on motorised modes and specifically towards the construction of infrastructure which produce very small time savings for large absolute numbers of vehicles, such as motorway widening.

We would suggest that any such indicators should include a proposed scheme’s effects on walking and cycling journeys and those of public transport users. They should also fully reflect the existence of induced traffic (the effect where speeding up a motorised journey, by whatever means, creates new motorised journeys which would not otherwise have been made) and peak spreading (the effect where reducing peak journey times leads to other journeys shifting to peak times). Furthermore, they should reflect the necessity for any such schemes to include road space redistribution away from private car and, in some cases, away from goods vehicles, to prevent induced traffic.

We believe that demonstration projects supported by the EU should include lower-carbon replacements for existing forms of transport, e.g. ultra-light rail vehicles to replace existing heavy rail vehicles on lightly trafficked lines.

With regard to the urban challenge: the document recognises that, as many journeys start and end in towns and cities, changes within the urban area have effects beyond their boundaries. Subsidiarity need not prevent the Commission creating a fund at the European level for which cities and towns can directly bid for city-wide projects where infrastructure is systematically reallocated to favour lower-carbon transport modes (The process could be similar to the ‘cycling demonstration towns’ approach in the UK, without necessarily being focussed on a single mode).

10. If you have a view on a specific policy instrument identified by the Commission (as described in the breakdown of Section 5 in “The proposal”) please identify the policy instrument and set out your view.**11. What do you think the EU’s role should be?**

The RTPI believes that the EU’s role with regard to transport should be to support the move toward a low carbon transport system whilst continuing to support economic competitiveness. They also have a role in facilitating the exchange of best practice across the Union.

12. What additional policy instruments would you wish to be included?

We suggest that the EU set a specific timeframe for when the use of the internal combustion engine will no longer be permitted. This will provide a powerful incentive to the industry to develop less-polluting alternatives and to commercialise existing technologies which remain at the prototype stage. While the decarbonisation of transport will be a long process, the adoption of a specified date will have a powerful effect in concentrating minds and showing that a genuine commitment to lower carbon transport exists across the EU.

13. Rather than policy instruments what specific policy options should the EU be developing?

If you have any other general comment that you would like to make concerning this consultation, please give them here:

We would prefer to have electronic copies of your response so please email this completed form to: [EUFutureofTransport @dft.gsi.gov.uk](mailto:EUFutureofTransport@dft.gsi.gov.uk)

Alternatively you can post the completed form to:

**EC Consultation on “A Sustainable Future for Transport”
Department for Transport
1/31 Great Minster House
76 Marsham Street
London SW1P 4DR**

The deadline for responses is: **Monday 7 September 2009.**